

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

W&D Interim Lender LLC, a Delaware limited
liability company,

Plaintiff,

v.

Mayflower Vernon Hills, LLC, a Delaware
limited liability company,

Defendant.

Hon. Virginia M. Kendall

Case No. 1:20-cv-06127

Real Property Address:

350 North Milwaukee Avenue
Vernon Hills, IL 60061

Commercial Foreclosure

NOTICE OF MOTION

To: Attached service list.

PLEASE TAKE NOTICE that on March 6, 2023 at 9:00 a.m., the undersigned will appear before the Honorable Virginia M. Kendall, or any judge sitting in her stead, in Room 2503 of the Dirksen Building, 219 S. Dearborn St., Chicago, IL, and shall then and there present ***RECEIVER'S MOTION TO APPROVE ASSET PURCHASE AGREEMENT***, a copy of which is hereby served upon you.

Dated: February 27, 2023

LONG HILL AT MAYFLOWER, LLC

By: /s/ Julia D. Riedel Emfinger
One of Its Attorneys

Nancy A. Peterman
Julia D. Riedel Emfinger
Greenberg Traurig, LLP
77 W. Wacker, Suite 3100
Chicago, IL 60601
(312) 456-8400
petermann@gtlaw.com
emfingerj@gtlaw.com

SERVICE LIST

Mayflower Vernon Hills, LLC
Attn: Christopher Falkowski
Cody Erwin
800 Third Avenue, Building 25
New York, NY 10022
cfalkowski@cscapitaladvisors.com
cody.erwin@jeacorp.com

James R. Cass, Esq.
Robinson Bradshaw
jcass@robinsonbradshaw.com
Counsel for Cody Erwin (Guarantor and 50% member of Borrower)

Nancy Olson, Esq.
Skadden, Arps, Slate Meagher & Flom, LLP
Nancy.olson@skadden.com
Counsel for Mayflower Vernon Hills Investor, LLC (50% member of Borrower)

Katherine R. Catanese, Esq.
Foley & Lardner LLP
kcatanese@foley.com
Counsel for Jerry Erwin Associates, Inc. ("JEA") (Manager)

CERTIFICATE OF SERVICE

Julia D. Riedel Emfinger, an attorney, hereby certifies that on February 27, 2023, a copy of the foregoing ***NOTICE OF MOTION*** and ***RECEIVER'S MOTION TO APPROVE ASSET PURCHASE AGREEMENT*** were served by electronic mail on the following parties and on all parties of record by the Court's CM/ECF filing system:

Mayflower Vernon Hills, LLC
Attn: Christopher Falkowski
Cody Erwin
800 Third Avenue, Building 25
New York, NY 10022
cfalkowski@cscapitaladvisors.com
cody.erwin@jeacorp.com

James R. Cass, Esq.
Robinson Bradshaw
jcass@robinsonbradshaw.com
Counsel for Cody Erwin (Guarantor and 50% member of Borrower)

Nancy Olson, Esq.
Skadden, Arps, Slate Meagher & Flom, LLP
Nancy.olson@skadden.com
Counsel for Mayflower Vernon Hills Investor, LLC (50% member of Borrower)

Katherine R. Catanese, Esq.
Foley & Lardner LLP
kcatanese@foley.com
Counsel for Jerry Erwin Associates, Inc. ("JEA") (Manager)

/s/ Julia D. Riedel Emfinger
Julia D. Riedel Emfinger